

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE APPLICATION OF PV GROUP  
LIMITED FOR JUDICIAL  
ASSISTANCE PURSUANT TO 28 U.S.C.  
§ 1782**

Case No. 18-

**EX PARTE PETITION**

Applicant PV Group Limited hereby applies to the Court ex parte for an order of judicial assistance, pursuant to 28 U.S.C. § 1782, appointing Tara J. Plochocki as a Commissioner of the Court to facilitate the issuance of subpoenas and the gathering of documentary and testimonial evidence from three witnesses in this district: (1) JPMorgan Chase Bank N.A.; (2) Bank of New York Mellon; and (3) Citibank N.A.

The requested relief is for the purpose of obtaining limited, but critical, discovery for use in connection with a foreign civil proceeding currently pending in the High Court of England and Wales in which PV Group Limited is an interested person. The grounds for this Application are set forth in the accompanying Memorandum of Law in Support of Application for Judicial Assistance Pursuant to 28 U.S.C. § 1782 and the Declarations of Andrew J. Ford and Tara J. Plochocki.

Respectfully submitted,

Dated: August 17, 2018

s/ Tara J. Plochocki  
Tara J. Plochocki (NY Bar No. 5359054)  
**LEWIS BAACH KAUFMANN**  
**MIDDLEMISS PLLC**  
405 Lexington Avenue, 62nd Floor  
New York, New York 10174  
Tel: (212) 826 7001  
Fax: (212) 826-7146  
tara.plochocki@lbkmlaw.com